

JESUS A. URIBE LONDONO
REG. No. 18870-069
FMC DEVENS
P. O. BOX 879
AYER, MA) 01432
PRO SE DEFENDANT

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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U.S. DISTRICT COURT
SAN JUAN, P.R.

UNITED STATES OF AMERICA
Plaintiff

Vs.

Case Number
3:00-cr-92
Judge Jose A. Fuste

JESUS A. URIBE LONDONO
Pro Se Defendant

MOTION BY THE PRO SE DEFENDANT UNDER ORDER TO SHOW CAUSE IN ORDER
TO HAVE THE GOVERNMENT COMPLY WITH THE COURT'S ORDER OF MARCH 10,
2004 AND RETURN THE DEFENDANT'S PROPERTY THAT IS NOT RELATED TO
THE CASE

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CONSOLIDATED DECLARATION ARGUMENT AND MEMO OF LAW UNDER ORDER TO
SHOW CAUSE BY THE PRO SE DEFENDANT REQUESTING THE COURT'S ORDER
TO HAVE THE GOVERNMENT COMPLY WITH THE COURT'S MARCH 10, 2004
ORDER AND RETURN THE DEFENDANT'S PROPERTY THAT IS NOT RELATED
TO THE CASE

DECLARATION AND AFFIRMATION

Jesus A. Uribe Londono, Pro Se Defendant, herein after defendant, declares and affirms under the penalty of perjury that the instant filing is true.

ON MARCH 10, 2004 IN DOCUMENT NUMBER 231 THE COURT ORDERED THE
GOVERNMENT TO RETURN THE DEFENDANT'S PROPERTY THAT IS NOT RELATED
TO THE CASE WHEREIN THE GOVERNMENT FAILED TO COMPLY WITH THE
COURT'S ORDER AND WITHHELD THE PROPERTY

1. In **EXHIBIT 1** attached hereto the Court ordered on March 10, 2004 in Document Number 231 that the Government had to return the defendant's property that is not related to the case.

THE GOVERNMENT FAILED TO COMPLY WITH THE COURT'S ORDER AND WITHHELD
THE DEFENDANT'S PROPERTY

2. The Government failed to comply with the Court's March 10, 2004 order and withheld the defendant's property. The failure by the Government to follow the Court's above order are the ground for the instant order to show cause requesting the Court to order the Government to return the following defendant's property.

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PROPERTY NOT RELATED TO THE CASE THAT SHOULD BE RETURNED BY THE
GOVERNMENT TO THE DEFENDANT'S AUTHORIZED PERSON BETZAIDA CASTRO
CRESPO, CALLE 10 F-12 FAIRVIEW, SAN JUAN, PUERTO RICO, PHONE
NUMBER 787-329-9838

LIST OF ITEMS

1. One Olympus Remote Control RC-200
2. One Olympus M-II Zoom Camera
3. Onee passport
4. One electronic agenda for telephone numbers
5. Phone numbers, photographs, office messages
6. Telephone computer books
7. 2 activity log
8. Ameerican Express folder
9. Registration form for e-mail
10. Address books
11. Calendars
12. Notebooks
13. Business cards and Post its
14. Computer CD's and Disks (copies)
15. Copies of 1B 8 One Hard Drive
16. Citibank Gold Bill and other receipts
17. Natural Resources Video Cassettes
18. One Pro-Master Tripode

THE ABOVE DEFENDANT'S PROPERTY ARE NOT RELATED TO THE CASE

3. The Government's attached Inventory in **Exhibit 2** shows all of the defendant's property that are held by the Government. The

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Government did return the defendant's clothing items, mask and snorkel and maps of Puerto Rico only to the defendant's authorized person. The Government further returned the following items to Banco Interamericano in Washington D.C.:

- A. Computer Hard Drive
- B. Computer Speakers
- C. Computer Printer
- D. Computer Monitor
- E. Keyboard

THE DEFENDANT REQUIRES THE ABOVE LISTED PROPERTY NOT RELATED TO
THE CASE FOR HIS FUTURE EMPLOYMENT

4. The defendant requires the above items held by the Government for his future employment and re-integration into society. Those items are not related to the case, as they are business records, business cards, handwritten papers and notebooks that contain field trip notes based on natural resources that were part of the defendant's work product.

The above work product and professional notes items cover a period of some 20 years of the defendant's work history.

5. The defendant is asking for originals of his above work product items (as they are held by Government) where the Government can maintain copies of the work product items.

All of the defendant's work product items are not related to the case.

6. The defendant had no Court access to proceed with the instant application up to the present time based on prison restrictions due to his transfer between two prisons.

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CONCLUSION

Based on the papers filed in the instant action the defendant is respectfully requesting the Court to order the Government to return the defendant's work product and personal items listed above.

RESPECTFULLY SUBMITTED,

January 10, 2005.

By

A handwritten signature in black ink, appearing to read "J. Uribe", is written over a horizontal line.

JESUS ALBERTO URIBE LONDONO

Pro-Se Defendant

Reg. No. 18870-069

FMC Devens Unit G-1

P.O. Box 879

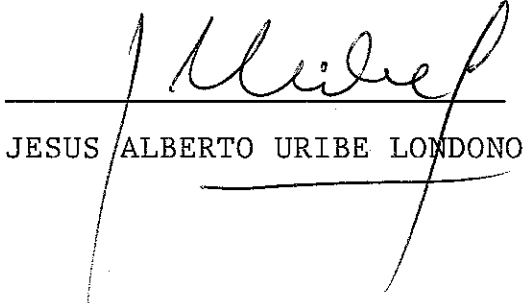
Ayer, Ma 01432

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, That on this date a true and correct copy of the foregoing motion has been mailed to: Maritza Gonzalez de Miranda, U.S.D.C.P.R. No. 208801, Assistant U.S. Attorney, Torre Chardon Suite 1201, Carlos Chardon Avenue #350, Hato Rey, Puerto Rico 00918.

January 10, 2005

By,



JESUS ALBERTO URIBE LONDONO
